

# U.S. Environmental Protection Agency Explanation of Significant Difference (ESD) Fact Sheet



## Southside Chattanooga Lead Superfund Site

Chattanooga, Tennessee

September 2021

### What is an Explanation of Significant Difference?

EPA is required to issue an ESD when, after issuance of a Record of Decision (ROD), a significant, but not fundamental, change is made in either scope, performance, or cost of a selected site remedy.

### Introduction

The U. S. Environmental Protection Agency is issuing an Explanation of Significant Differences (ESD) for the Southside Chattanooga Lead Superfund Site (Site) located in Chattanooga, Hamilton County, Tennessee. This ESD Fact Sheet summarizes proposed changes to the estimated volume of impacted soil and the cost it will take to conduct the residential soil cleanups as identified in the 2019 Interim Record of Decision (ROD). These changes represent a significant change in the selected remedy. The Tennessee Department of Environment and Conservation (TDEC) is expected to concur with this ESD. The issuance of an ESD is required by the National Oil and Hazardous Substances Pollution Contingency Plan and Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The EPA is the lead agency for actions taken at the Site.

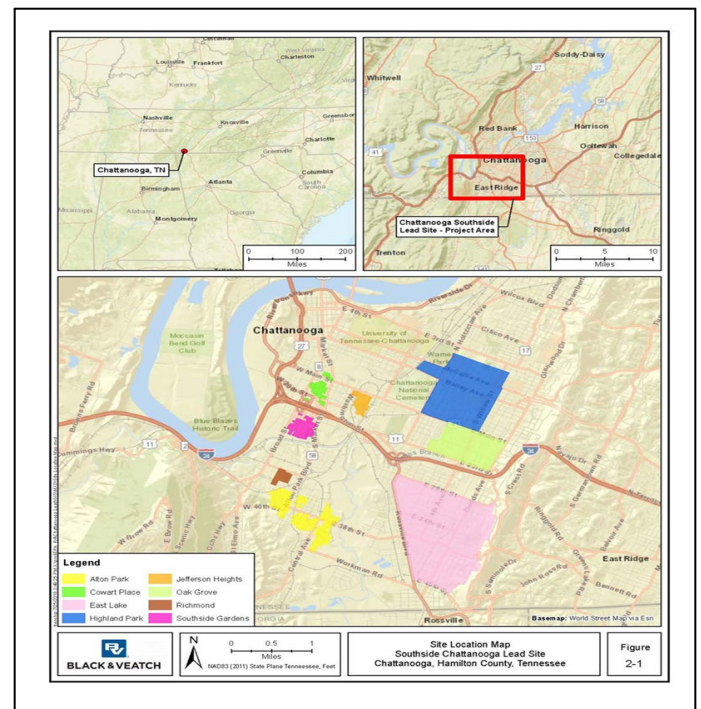
### Background

The Site is in Chattanooga, Hamilton County, Tennessee. From the middle of the 19th century to the late 20th century as many as 60 foundries operated in the City of Chattanooga. Many produced iron and brass cast products that were produced by pouring molten metal into molds. Sand was the most common molding material used. While the foundry sand was reused, sand fines, spent sands, and baghouse dust were waste products that were removed from the process periodically. Fines, spent sand, and baghouse dust can contain elevated concentrations of lead and other metals. Anecdotal information indicates that it was common practice for foundries to give residents excess foundry waste material to use as fill and topsoil.

### Interim Remedy

In February 2019, the EPA approved an Interim ROD that required cleanup of residential soil with a lead concentration greater than 360 parts per million (ppm) in 8 specific areas/neighborhoods of Chattanooga (see map insert).

The remedy selected included excavating contaminated soil, backfilling with clean soil, and revegetating disturbed areas. Commercial/industrial properties in the 8 areas/neighborhoods were to be addressed by TDEC.



## Status of Cleanup Activities

As of June 2021, sampling of residential properties (front and back yards) in 8 neighborhoods is approximately 40 percent complete. Of the 2197 properties sampled, 929 have been identified for cleanup of lead contaminated soil and 238 properties have been cleaned up:

- 84 cleaned up out of 117 properties with a soil lead concentration greater than 1,200 parts per million (ppm); and
- 154 cleaned up out of 812 properties with a soil lead concentration greater than 360 ppm and less than 1200 ppm.

## Explanation of Significant Difference

The remedy selected in the 2019 Interim ROD is currently underway and consists of excavating lead-contaminated soil from residential properties in eight neighborhoods, disposing of contaminated soil offsite, and restoring the properties to their original condition. The Interim ROD estimated that it would cost \$25.87 million to implement the selected remedy addressing 203,000 cubic yards of non-hazardous lead-contaminated soil. The Interim ROD was based on sampling of a small fraction of properties in the eight neighborhoods.

**This ESD seeks to increase the cost of the remedy and volume of soil being excavated from residential properties and disposed offsite. Otherwise, the selected remedy remains the same as described in the 2019 Interim ROD.** The estimated cost of remediating the Site has increased to \$113.5 million, and the volume of lead-contaminated soil being removed has increased to 433,300 cubic yards. There are no other changes to the selected remedy.

The following are some of the changes to cost assumptions that have led to this request for increased funding:

- The number of properties to be sampled increased from the estimated 3,600 to 5,000 when the City's zoning designations were more thoroughly investigation during implementation.
- The estimated number of properties exceeding the cleanup level increased from the 1,100 to 1,832 when a larger percentage of properties were sampled.
- The average volume of soil removed per property increased from the estimated 184.5 cubic yards (CY) to 232.8 CY (based on actual cleanup records).
- The average cleanup cost per property increased from the estimated \$23,520/property to \$60,000/property, based on actual expenditure over a 15-month period.

## Public Notification

The Explanation of Significant Differences (ESD) is available online by clicking the link for the ESD on the site webpage <https://www.epa.gov/superfund/southside-chattanooga-lead>. The ESD will also be sent to the Site Repository located at South Chattanooga Library, 925 West 39th Street, Chattanooga, Tennessee 37410.

Due to public health concerns related to the spread of the COVID-19 virus, the EPA is not planning to hold an in-person public meeting about the ESD. The EPA and its Superfund team are cancelling or postponing in-person public meeting events, and other site-related face-to-face interactions to reflect current COVID-19 guidance from federal, state, tribal and local officials. Protecting the health and safety of our staff, contractors, and the communities we serve is our top priority. Instead, to provide members of the community with information related to the ESD, the EPA has posted a pre-recorded video presentation on our website in which the Remedial Project Manager for the Site presents and explains the ESD. You may view the presentation, complete with closed captioning, by selecting the link on the site webpage: <https://www.epa.gov/superfund/southside-chattanooga-lead>.

## FOR MORE INFORMATION

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To access the video presentation, you will need a device with web access and sound capability (smart phone, tablet, or computer). If you cannot access the EPA website, please contact Stephanie Y. Brown, Community Involvement Coordinator, at 404-562-8450 or [Brown.StephanieY@epa.gov](mailto:Brown.StephanieY@epa.gov) to arrange to receive the information in some other format.

Two on-line virtual community meetings will be held, and the public is invited to attend either of the on-line meetings. A presentation will be given at these meetings, and attendees will have the opportunity to ask questions. Spanish translation services will be provided. The meetings will be on the following dates and times: September 23<sup>rd</sup> at 12:00 pm EDT and September 28<sup>th</sup> 6:00 pm EDT. The details of these meetings will be shared via our Site webpage <https://www.epa.gov/superfund/southside-chattanooga-lead> and as a public notice to the local newspaper.